

Exhibit 2

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April 30, 2023

**NOTICE OF LITIGATION
DEMAND TO CEASE AND DESIST
DEMAND TO PRESERVE DOCUMENTS**

VIA EMAIL To: ncjc@ncjc.org; harrington@ncjc.org; chastity-dillard@ncjc.org

The Neighborhood Centers of Johnson County
2651 Roberts Rd.
Iowa City, IA 52246

Re: Charming Beats LLC. adv. The Neighborhood Centers of Johnson County
("NCJC")

NCJC:

I represent Charming Beats LLC the sole owner of the copyrighted recording and composition titled "First Day" – U.S. Copyright Registration No. SR 708-490 (the "Copyrighted Track"). NCJC created a commercial for NCJC titled "Be My Neighbor" with an unlicensed reproduction of the Copyrighted Track (the "Infringing Video"). NCJC then distributed the unlicensed Infringing Video to YouTube where the Infringing Video was, and is, publicly displayed on the NCJC YouTube Page located at <www.youtube.com/watch?v=U8xFXhZ0I-U>.

At no time did NCJC have a license to synchronize, distribute, or publicly display the Copyrighted Track. NCJC was informed of the fact that there was no license by YouTube, but elected to continue to publicly display the unlicensed Infringing Video.

Quite evidently, NCJC has infringed my client's exclusive rights to the Copyrighted Track as set forth in Section 106 of the U.S. Copyright Act. This matter is going to proceed in one of two ways: (i) we can negotiate a license that would cover NCJC's infringing conduct, or (ii) I can file an action in federal court. My client does not want to litigate this matter, and I am sure we can agree on a license fee. If, however, NCJC does not respond, or has no intent to resolve this matter, a complaint will be filed on May 5, 2023.

If NCJC is interested in a resolution, kindly contact me at rgarbarini@garbarinilaw.com or at 212.300.5358, no later than 3:00 pm on May 5, 2023. In the interim, NCJC is required to

remove the Infringing Video from every third-party Internet service provider and preserve all documents including web pages, in their original condition, or face a possible spoliation charge at the trial of this action.

GARBARINI FITZGERALD P.C.

By: Richard M. Garbarini
Richard M. Garbarini